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September 30, 2021

*Via U.S. Mail*

The Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, N.Y. 10007

**Re: Testimony of Daniel H. Stewart in *United States v. Lev Parnas, et al.*, 19-cr-725 (JPO)**

Dear Judge Oetken:

The Government issued a trial subpoena to Nevada attorney Daniel H. Stewart in the above-referenced matter. Mr. Stewart is a partner at my law firm, and I have been representing him in his conversations with both the Government and defense counsel.

With my advice and counsel, Mr. Stewart and our firm have been careful to make sure that he does not reveal privileged communications he may have had with any of the Defendants. By now, we do believe that the Government, defense counsel, and Mr. Stewart have a good understanding of where the privilege boundaries lie, and all appear willing and able to stay within those boundaries efficiently and effectively. That said, I hope to be able to listen in telephonically during his testimony. To the extent that he is faced with questions that may require further analysis of possible issues related to the attorney-client privilege, I would respectfully request that he be permitted to ask for a chance to take a break to consult with me privately.

When and if such a consultation may be appropriate, I would of course leave to your sound discretion. But I can assure you that my client has absolutely no intention of delaying the trial or disrupting it in any way. Nor would Mr. Stewart consult with me on any issues save those related to possible attorney-client privilege.

As you can imagine, this is a delicate matter for any testifying attorney, and I thought it appropriate to bring it to your attention. Both my client and I greatly appreciate your time and attention, and any efforts you may make to help Mr. Stewart navigate the challenges so that he can deliver both probative and proper testimony.

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Please do not hesitate to contact me with any questions or concerns.

Sincere regards,

HUTCHISON & STEFFEN, PLLC

*/s/ Todd L. Moody*

Todd L. Moody  
*For the Firm*

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